EPA REGISTRATION NUMBER 9339-24 - VOL. 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUN 2 7 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Hamdi Latif
Technical Director for, or,
Flexdel Corporation
1969 Rutgers University Blvd.
Lakewood, NJ 08701

Subject: Flexgard VI Waterbase Preservative Copper Paint

EPA Registration Number 9339-24

Your Amendment Dated March 28th, 2012 EPA Received Date March 30th, 2012

The amendment referred to above, submitted in connection with registration under the Federal Inseciticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to change the concentration of some of the inert ingredients on the Basic Confidential Statement of Formula (CSF), is acceptable.

The revised CSF, dated June 5, 2012, was reviewed and found acceptable.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

Product Manager 33

Regulatory Management Branch I

Antimicrobial Division(7510P)

DECISION PKG. NO. 43847 SUBM. DUE DATE 6/28/20 SUBMISSION BAR CODE # 9/4434 REVIEWER MATERIAL KL

| FILE SYMBOL/F | eg no. <u>9339-</u> 2 | 74 PM | ACTION CODE | 362 | |
|------------------|--|--------|-------------------------------------|--------------|--------------|
| | CS Ameramen | * 2 | fqpa | NFQ: | PA |
| | D RESISTANT PACKA | | | | |
| | APPLICATION | | | | |
| | THOD OF SUPPORT | | ULATORS EXEMP SUBMITTED (N/A | | SUBMITTED . |
| REVIEW(S) REQ | [] SELECT: TTED [] N/A UESTED DATA PACK # | | | DATI RETU | 2 |
| CHEMI | STRY | _][| _] [|][| ~ |
| | ACY | * | | | |
| ACUTE | TOX |] [| _].[| .] [| |
| | TOX | - | | | |
| ENVIRON. | FATE | _) [| _] (| .] [| |
| FISH/WILD | IFE | 1 [| _] (| .1 [| |
| OTHER: | ; | | _1[| _1 [| |
| | _ | | | | |
| RE | SPONSE CODE | | RESPONSE D | ATE | |
| SCIENCE GROUP | DIVISION | BRANCH | SECTION | CSF Y/N | LABEL Y/N |
| | 2.0 | EASSB | CTT_ | | |
| CHEMISTRY | AD. | | | | |
| EFFICACY | AD | EASSB | EET | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



United States Environmental Protection Agency Office of Pesticide Programs

Antimicrobials Division (AD)

June 19, 2012

DP BARCODE:

401060

MRID:

N/A

SUBJECT:

Flexgard VI Waterbase Preservative Copper Paint

REG. NO .:

9339-24

DOCUMENT TYPE:

Product Chemistry Review

Manufacturing-use []

OR

End-use Product [X]

INGREDIENTS:

PC Code(s)

CAS Number

Active Ingredient(s):

025601

1317-39-1

Cuprous oxlde

TEST LAB:

N/A

SUBMITTER:

Flexabar Corp.

GUIDELINE:

Product Chemistry

ORGANIZATION:

AD\PSB\CTT

REVIEWER:

Lynette T. Umez-Eronini

APPROVED BY:

Karen P. Hicks

APPROVED DATE:

June 19, 2012

COMMENT:

This product is for non-food use.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



United States Environmental Protection Office of Pesticide Programs Agency

Antimicrobials Division (AD)

June 19, 2012

MEMORANDUM

SUBJECT:

Product Chemistry Review for EPA Reg. 9339-24

Product Name: Flexgard VI Waterbase Preservative Copper Paint

DP Barcode: 401060

CODE:

362 Formula Change; Technical

DATE DUE:

June 28, 2012

FROM:

Lynette T. Umez-Eronini, Chemist Lynette T. Wmg-Eurnini
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Karen Hicks, Team Leader
Chemistry and Toxicology Team

THRU:

Product Science Branch

Antimicrobials Division (7510P)

TO:

Marshall Swindell PM#33/Martha Terry

Regulatory Management Branch I Antimicrobials Division (7510P)

Applicant:

Flexabar Corp.

PRODUCT FORMULATION FROM LABEL:

Active Ingredients: Cuprous oxide

% by wt. 18.00

Other Ingredient(s):

82.00

Total:

100.00

(Copper as metallic 16.29%)

BACKGROUND:

The registrant, Flexabar Corp. has submitted an amendment to incorporate a and add on the Basic Confidential Statement of Formula (CSF) of a non-integrated and an end-use product called Flexgard VI Waterbase Preservative Copper Paint. This product is a pigmented coating that is used to prevent the attachment of both plant and animal fouling on vessels immersed in seawater and brackish water. The product is for non-food use.

The original data package included:

- 1. A paper, Inert Ingredient Amendment, pin-punched March 30, 2012.
- EPA Form 8570-27, dated March 28, 2012.
- 3. Basic CSF, dated May 6, 1992.
- 4. Basic CSF, dated June 15, 1999.

A revised data package included:

A revised Basic CSF, dated June 5, 2012.

FINDINGS:

- The Basic CSF, dated May 6, 1992 and product label, dated March 1, 2000 are used as references.
- The Basic CSF, dated March 23, 2012, which was originally submitted as part
 of this package required correction. A correction request was made via a
 phone call and e-mail to the registrant. The registrant complied by e-mailing a
 revised Basic CSF, dated June 5, 2012.
- The nominal concentration of the active ingredient on the revised Basic CSF, dated June 5, 2012 is consistent with the product label.
- 4. All certified limits meet EPA standard certified limits.
- The active ingredient source is EPA registered and all other ingredients in this formulation are approved for use in pesticide formulations.

CONCLUSION:

Product Science Branch of Antimicrobials Division finds the amendment for 9339-24 to modify the Basic CSF, dated June 5, 2012 to be acceptable and to supersede all previous CSFs.

DATA PACKAGE BEAN SHEET

Date: 18-Apr-2012

Page 1 of 1

Decision #: 463847

DP #: (401060)

NON PRIA

Parent DP #:

Submission #: 914434

E-Sub #:

* * * Registration Information * * *

| Registration: | 9339-24 - FLEXGAR | RD VI WATERBASE PR | ESERVATIV | VE COPPER | PAINT | |
|------------------------|---------------------------|-----------------------------|-------------|-----------------|-------------------|-------------|
| Company: | 9339 - FLEXABAR CORF | > | | | | |
| Risk Manager: | RM 33 - Marshall Swinde | II - (703) 308-6341 Room# P | /1 S-8828 | | | |
| Risk Manager Reviewer: | Martha Terry MTERRY | | | | | |
| Sent Date: | | Calculated Due Date: | 28-Jun-2012 | | Edited Due Date: | |
| Type of Registration: | Product Registration - Se | ction 3 | | | | |
| Action Desc: | (362) FORMULA CHANG | E;TECHNICAL; | | | | |
| Ingredients: | 025601, Cuprous oxide(1 | 8%) | | | | |
| | * * * | Data Package Info | rmation * | ** | | |
| Expedite: | ○ Yes ● No | Date Sent: | 18-Apr-2012 | | Due Back: | |
| DP Ingredient: | 025601, Cuprous oxide | | | | | |
| DP Title: | CSF Amendment | | | | | |
| CSF Included: | ● Yes ○ No | Label Included: Yes | No Pare | ent DP# | | |
| Assigned T | 0 | Date In | Date Out | | | |
| Organization: AD / P | SB | | | Last Possible S | Science Due Date: | 14-May-2012 |
| Team Name: CTT | | | | 5 | Science Due Date: | |
| Reviewer Name: | inelle | 4/19/12 | | Sub Data P | ackage Due Date: | |

* * * Studies Sent for Review * * *

No Studies

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

Please review the attached CSF

Contractor Name:

DATA PACKAGE BEAN SHEET

Date: 18-Apr-2012
Page 1 of 1

Decision #: 463847 DP #: (401060)

NON PRIA

Parent DP #:

Submission #: 914434

E-Sub #:

* * * Registration Information * * *

| Registration: | 9339-24 - FLEXGARD | VI WATERBASE PR | ESERVATIV | E COPPER PAINT | |
|-------------------------|--------------------------------|-------------------------|-------------|---------------------------------|-------------|
| Company | 9339 - FLEXABAR CORP | | | | |
| Risk Manager: | RM 33 - Marshall Swindell - | (703) 308-6341 Room# P | Y1 S-8828 | | |
| Risk Manager Reviewer: | Martha Terry MTERRY | | | | |
| Sent Date: | | Calculated Due Date: | 28-Jun-2012 | Edited Due Date: | |
| Type of Registration: | Product Registration - Section | on 3 | | | |
| Action Desc: | (362) FORMULA CHANGE; | TECHNICAL; | | | |
| Ingredients: | 025601, Cuprous oxide(18% |) | | | |
| | * * * D | ata Package Info | ormation * | * * | |
| Expedite: | ○ Yes ● No | Date Sent: | 18-Apr-2012 | Due Back: | |
| DP Ingredient: | 025601, Cuprous oxide | | | | |
| DP Title: | CSF Amendment | | | | |
| CSF Included: | Yes No Lab | el Included: O Yes | No Parer | nt DP # | |
| Assigned T | o . | Date In | Date Out | | |
| Organization: AD / F | PSB | | | Last Possible Science Due Date: | 14-May-2012 |
| Team Name: CTT | | | | Science Due Date: | |
| Reviewer Name: | | | | Sub Data Package Due Date: | |
| Contractor Name: | | | | | |
| | * * * Stu | dies Sent for Re | view * * * | | |
| | | No Studies | | | |
| | * * * Additional Da | ata Package for | this Decisi | on * * * | |
| | No | Additional Data Package | s | | |
| | * * * Data | Package Instruc | tions * * * | | |
| Please review the attac | | | | | |
| | | | | | |

Inert Ingredient Amendment

Flexgard VI Waterbase Preservative (9339-24) Registered 6-15-99



All Inert Ingredients are listed in the EPA Database.

The following MSDS's are provided:



No other amendments were made to effect overall specification.

These amendments will not cause any adverse effect in the final formulation causing no harm to the consumer or environment.

Inert ingredient information may be entitled to confidential treatment

| Please read instructions of | on reverse before comple | ting f | Form A | pproved, OMB N | 070-0060 | PHILE FORM |
|---|---|---|---|--|------------------------------------|--|
| \$EPA | Environmenta | Inited States I Protection A ngton, DC 20460 | gency | Registra × Amenda Other | | OPP Identifier Number |
| | | Application for | r Pesticide - S | ection I | | |
| 1. Company/Product Num FLEXABAR CORPORAT | | | 2. EPA Product I | Vanager | 3. Pr | roposed Classification |
| 4. Company/Product (Nat FLEXABAR CORPORA | me) TION/FLEXGARD VI WA | ATERBASE PRESERV | Ai PM# | | | None X Restricted |
| 5. Name and Address of FLEXABAR CORPORA 1969 RUTGERS UNIV | TION ERSITY BLVD. | | (b)(i), my produ to: EPA Reg. No Product Nam | ct is similar or ident | tical in co | FIFRA Section 3(c)(3) emposition and labeling |
| | | S | ection - II | | | |
| X Amendment - Exp | esponse to Agency letter | dated | Agency "Me To | inted labels in respons letter dated o" Application. Explain below. | e to | |
| | VERE CHANGED DUE TO FALL WITHIN THE SAM | D DISCONTINUED I IE SPECIFICATION F | PRODUCTS OR THE | | | ES HAVE GONE OUT OF EASONABLE ADVERSE |
| 1. Material This Product | MOR De Deshared by | 3 | BCHOH - III | | | |
| Child-Resistant Packagin Yes No * Certification must be submitted | Unit Packaging Yes No | No per III | Yes No. pokage wgt conta | × | Metal Plastic Glass Paper | Specify) |
| 3. Location of Net Conte | | 4. Size(s) Retail Co | ntainer | 5. Location of Lat | bel Direction | ons |
| X Label | Container | 553/2,965 LB5 | | | | npanying product |
| 6. Manner in Which Labe GLUED TO OUTSIDE O | | X Lithograph Peper glued Stenciled | | ther | | |
| | | | ection - IV | | | |
| 1. Contact Point (Comp) | ete items directly below | | | ted, if necessary, to p | rocess this | application.) |
| Name HAMDI LATIF | | | TECHNICAL DIDECTOR | | | e No (Include Area Code) |
| I certify that the st I acknowledge that both under applica | atements I have made on t any knowingly felse or r ble law. | Certification this form and all at misleeding statement | achments thereto are may be punishable by | true, accurate and co y fine or imprisonment | mplote. | 6. Date Application Resulvus (Stamped) |
| 2. Signature | | 3. Titl | Title | | | |
| artica | Dogleche | C,E.C | E.O. | | | - |
| 4. Typed Name | | 5. Dar | 032812 | | | |
| ANDREW GUGLIELMO | | | 072012 | | | |



UNITED (TES ENVIRONMENTAL PROTECTION . :NCY WASHINGTON, D.C. 20460

April 5, 2012

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

ROBERT FRANZETTI FLEXABAR CORP 1969 RUTGERS UNIVERSITY BLVD LAKEWOOD, NJ 08701

PRODUCT NAME: FLEXGARD VI WATERBASE PRESERVATIVE COPPER PAINT

COMPANY NAME: FLEXABAR CORP OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 9339-24 EPA RECEIPT DATE: 03/30/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 33, at (703) 308-6341.

Sincerely,

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division

Fee for Service {914434"~

| ● AD ● BPPD ● RD Risk Mgr. 33 |
|---|
| 914434 9339-24 3/30/2012 FFS action. |
| Parent/Child Decisions: |
| Uncleared Inert in Product Date: April 2, 8015 |
| |

| S: \$14434 Regulatory Type; Product Registrati | on - Section 3 | Resubmission. Fee For Service: | C Yes 6 | | Print Letter |
|--|--|---------------------------------|--|---------------------|---|
| Application Type: Amendment | | Billable: | C Yes 6 | Vo | Enter More Information |
| Company: 9339 FLEXAB | AR CORP | λ | 4 | | Tracking |
| Risk Manager: Antimicrobials Divi | ision. Risk Management | Teem 33 | 70094 July 1 | | |
| A STATE OF THE STA | Product Name; FLEXGAR | MARINE THE PROPERTY OF THE | CERVATIVE | _ | |
| Override# | roduct Name, j LEAGAN | D VIVWA (ENBAGE FINE | SENTAINE | | |
| Me Too | - Me Too | | | | |
| Section3; | Product Name: | | | | ¥***** |
| Application Date: 28-Mar-2012 | OPP R | ec'vd Date: 30-Mar-20 | 112 | Receipt Cont | ent |
| Front End Date: 30-Mar-2012 | Company of the compan | Send Date: 02-Apr-20 | The state of the s | CSF | |
| FFS Due Date: | Negotiated | Due Date: | | | 1 |
| OPP Target Date: | | | 4.3 | 4 | |
| Fast Track: | New Ingredient | | | | View/Edit |
| Receipt Description: CSF amendment | | | Nevy to | aredient | <u> </u> |
| | | | Reque | est Date. | |
| *** | | | New In | gredient ed Date | |
| | | | Kecely | ON DISKS | CONTRACTOR OF THE PARTY OF THE |

I 362 fm T] Send A Chem



Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product Distributor Company Number 9339-24 68571 Note: Do not submit distributor product labels Name of Registered Product (basic product name accepted by EPA) Distributor Product Name FLEXGARD VI FLEXGARD XI C

Name and Address of Distributor (Type; include ZIP code)

FLEXABAR-AQUATECH CORPORATION 1969 RUTGERS UNIVERSITY BOULEVARD LAKEWOOD, NEW JERSEY 08701

Read All Conditions Before Signing

- 1. The distributor product must have the same composition as the basic product.
- 2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
- 3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
- The product must remain in the manufacturer's unbroken container.
- 5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
- 6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
- 7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice. Signature and Title of Distributor RICHARD GUGLIELMO - PRESIDENT

Registrant

l agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this

Signature and Title of Registrant

ANDREW GUGLIELMO - VICE PRESIDENT

Solve Diglet

White - EPA

Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

| EPA Registration Number of Product 9339-24 | Distributor Company Number 68571 | | |
|---|--|--|--|
| Note: Do not subm | it distributor product labels | | |
| Name of Registered Product Wasic product name accepted by EPAI FLEXGARD VI | Distributor Product Name FLEXGARD XI C | | |

Name and Address of Distributor (Type; include ZIP code)

FLEXABAR-AQUATECH CORPORATION 1969 RUTGERS UNIVERSITY BOULEVARD LAKEWOOD, NEW JERSEY 08701

Read All Conditions Before Signing

- The distributor product must have the same composition as the basic product.
- 2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
- 3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
- 4. The product must remain in the manufacturer's unbroken container.
- 5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
- 6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
- 7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

| Distributor | |
|--|---|
| Ne intend to market our product under the Distributor Product Name specified above. Signature and Title of Distributor RICHARD GUGLIELMO - PRESIDENT | subject to the conditions specified on this Notice. |
| Registrant | |

agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this

Signature and Title of Registrent belie Diglish

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsolete

ANDREW GUGLIELMO - VICE PRESIDENT



Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

9339 - 24

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Distributor Company Number

95597/

Distributor Product labels

Flexgard VI Waterbase Preservative

Alpha Gard Waterbase RFU

Name and Address of Distributor (Type; include ZIP code)

Proteus S.A. 1st Km Koropi - Varis Avenue GR 19 400 KOROPI, GREECE

Read All Conditions Before Signing

- 1. The distributor product must have the same composition as the basic product.
- The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
- The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
- 4. The product must remain in the manufacturer's unbroken container.
- The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
- Distributor product labels must bear the name and address of the distributor qualified by Lucli terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
- 7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this No.ice.

Signature and Title of Distributor

Aristides Belles, Chairman & Managing Director

Distributor

10/29/08

Registrant

agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this

Signature and Title of Registrent

Robert Franzetti, Vice President

10-27-08

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsolete.

White - EPA



Environmental Protection Agency

Office of Pesticide Programs (7505C) Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

9339-24

Distributor Company Number

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Distributor Product Name

Flexgard VI Waterbase Preservative

SAVE NET Antifouling

Name and Address of Distributor (Type; include ZIP code)

Delta Aquaculture Equipment Ltd. Tunnel Caddesi Yali Yolu Sok. I. Ergin UI Merkezi No. 56/A-12 Ustbostanci, Istanbul

TURKEY

Read All Conditions Before Signing

- 1. The distributor product must have the same composition as the basic product.
- 2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
- 3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
- 4. The product must remain in the manufacturer's unbroken container.
- 5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
- 6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
- 7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specifies

Signature and Title of Distributor - Mufit Sendil/Managing Director

KÜLTUR BALIKÇILIĞI SAN VE TIL ETD STI Tünel Cad Yall Yolu Sok Ismail Ergin iş Mrk

A Blok No. 56 K.3 C-12/ Usibostano-951 trankby V.O. 2740984554 Tel:0216 380 91 50 380 91 61 380 91 52 Fax:0216 330 91 65

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to il.e. conditions specified on this Notice.

Registrant

Signature and Title of Registrant -Hamdi Latif/Technical Director

ប់ខ្មៅ

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsoleta.

*U.S. GPO. 1997-417-473/61206

Pages 18-20 Confidential Statement of Formula may be entitled to confidential treatment